

alc 74-0276
R: HR 12004

25 February 1974

MEMORANDUM FOR: Office of Legislative Counsel

ATTENTION :

STATINTL

SUBJECT : Agency Comments on H. R. 12004

1. Per your request, we have reviewed OLC's proposed reply to Chairman Holifield on H. R. 12004.

2. We have no problem with any of the helpful commentary included in the draft. However, we wonder if the following points could or should also be incorporated:

a. The requirement that the head of an agency authorize all delegations of classifying authority within his organization, plus the provision for a semiannual review of the continuing need for same, would place a heavy administrative burden on the Director.

b. The provision that any information classified more than 15 years ago is automatically declassified (unless exempted under the special provision for certain Top Secret material) would prematurely expose a large amount of "intelligence sources and methods."

c. The procedures which the proposed Classification Review Commission would promulgate would include a provision that no classified information could be withheld from Congress. (Possibly OLC considers it inappropriate to attempt to make such a point to Rep. Holifield.)

STATINTL

Chief, Information Systems Analysis Staff